

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

IN RE: LORRI KIRKSEY

Debtor(s).

)
) In Proceedings Under
) Chapter 13
)
) BK No.: 16-31496
)

**MOTION FOR CONTINUATION
OF AUTOMATIC STAY**

Now comes the Debtor(s) by and through her undersigned attorney and for her motion states as follows:

1. The Debtor filed the present chapter 13 case on September 29, 2016.
2. Debtor had a prior chapter 13 case pending within the past year.
3. Debtor had previously filed with her husband.
4. Debtor's husband was delinquent on post-petition child support payments in the previous case and was unable to provide proof that he was current on the obligation pursuant to an agreed order with the Trustee.
5. The current case has been filed without the Debtor's husband and payments of child support will not be an issue.
6. That Debtor desires this Court to continue the automatic stay under §362(c) and find that debtor has filed this case in good faith.

Wherefore, the Debtor prays that this Court continue the automatic stay pursuant to §362(c) and for such other relief as this Court deems just and reasonable.

RESPECTFULLY SUBMITTED,

By: /s/J.D. Graham
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CERTIFICATE OF SERVICE

Comes now Debtor by and through her attorney, and certify that on October 7, 2016, via first-class mail, postage prepaid, a true and accurate copy of the Motion to Continue Automatic Stay was served upon the following people that were not served electronically:

Russell C Simon
Chapter 13 Trustee
24 Bronze Pointe
Swansea, IL 62226

U.S. Trustee
Becker Building, Ste. 1100
401 Main St.
Peoria, IL 61602

All creditors listed on matrix.

/s/Meghan Csontos